I-57 Tracey Brown

I-57-1 The County acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.

I-57-2 The comment states that the design of the open space is poor and that the entire project area was designated for species conservation and intended to remain undeveloped by the County’s General Plan and the North County MSCP. See Topical Response BIO-1. The comment also states that any destruction of habitat in this area is a take of those planned conservation areas. Regarding the design of the open space areas, the open space areas meet the Design Criteria for Linkages and Corridors described in Attachment H of the Biological Mitigation Ordinance (County of San Diego 2010). The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-57-3 The comment states that the proposed blocks of open space are not contiguous as one of them is separated by a road and nowhere in the Draft EIR is it addressed as to how wildlife would move across this road to access the inner area of open space. The comment also states that this inner block should not be considered of conservation value if it is largely cutoff and exists as an island. See Topical Response BIO-2. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-57-4 The comment states that it appears that the project will span both the San Marcos and Escondido Unified School Districts. The comment stats that this fact alone indicates the project is too large in scope and asks why this would be allowed within a single development. As shown in Figure 1-3, School District Boundaries, the project site straddles the boundary line for the San Marcos Unified School District and the Escondido Unified School. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-57-5 The comment expresses concern over fire hazards and evacuation. Potential impacts as a result of wildfires have been adequately analyzed and disclosed in the Draft EIR in Section 2.8 Hazards and Hazardous Materials, Appendix N1 Fire Protection Plan, and Appendix N2 Evacuation Plan. Also see Topical Response -HAZ-1.

The comment also stats that a single fall fire can have 30 to 50 foot flames and travel 600 to 800 feet per minute. However, as stated in Section 2.8 Hazards and Hazardous Materials, on page 2.8-3, “Based on the fire behavior modeling, a worst-case summer fire would result in a fire spreading at a rate of up to 4.3 miles per hour (mph). During
a fall fire with gusty Santa Ana winds and low fuel moisture (peak condition), fire is expected to be fast moving at up to 17.3 mph, with highest flame length values reaching approximately 67 feet in specific portions of the Site. Spotting (where airborne embers can ignite new fires downwind of the initial fire) is projected to occur up to nearly 1 mile during a summer fire and nearly 2.8 miles during a fall fire.” In addition, as stated on page 2.8-17, “Flame lengths can reach 110 feet long in certain small, isolated fuel pockets with an average flame length under worst case conditions of 67 feet.” Therefore, max flames would be approximately 67 feet and flames could travel 400 to 1,500 feet per minute.

The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-57-6 The County acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.